REMARKS

Summary of the Office Action

The drawings have been objected under 37 C.F.R. § 1.83(a) as allegedly not showing each feature of the invention recited in the claims.

Claims 1, 2, 5, 6, 7, and 9 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Applicant's Related Art in view of JP 1998-487843.

Claims 3, 4, and 8 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Applicant's Related Art in view of JP 1998-487843 in further view of U.S. Patent No. 5,608,864 to *Bindlish et al.*

Summary of the Response to the Office Action

Claims 1, 3, 7 and 8 have been amended. No new matter has been introduced.

New claims 10-17 have been added. No new matter has been introduced.

Accordingly, claims 1-17 are presently pending for further consideration.

Objection to the Drawings

The drawings have been objected to under 37 C.F.R. § 1.83(a) as allegedly not showing each feature of the invention recited in the claims. In particular, the Office Action states that the multiplexer and frame memory must be shown. (Paragraph 1, lines 1-4.) As an exemplary multiplexer 44 is shown in FIG. 4 and an exemplary memory part 46 is shown in FIG. 3, Applicant is uncertain as to the basis of the objection under 37 C.F.R. § 1.83(a). Thus, Applicant

respectfully requests further clarification as to the basis of the objection, or that the objection be withdrawn.

All Claims Recite Allowable Subject Matter

Claims 1, 2, 5, 6, 7, and 9 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Applicant's Related Art in view of JP 1998-487843 (hereinafter, the '843 patent). Claims 3, 4, and 8 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Applicant's Related Art in view of the '843 patent in further view of U.S. Patent No. 5,608,864 to *Bindlish et al.* Applicants respectfully request that the rejections be withdrawn for at least the following reasons.

Independent Claims 1 and 7

Applicant has incorporated certain features of claims 3 and 8 into their respective base claims 1 and 7. As amended, independent claims 1 and 7 recite, in part, a memory temporarily storing the processed data. In the context of claims 3 and 8, the Office admits that Applicant's Related Art and the '843 patent, whether taken alone or in combination, fail to teach or suggest a memory as claimed in each of independent claims 1 and 7. As a result, the Office relies on *Bindlish et al.* to teach this feature. (Paragraph 4, lines 4-8.)

Specifically, the Office equates the video frame buffer memory 116 of *Bindlish et al.* with the claimed memory. (Paragraph 4, lines 4-8.) Applicant respectfully disagrees. *Bindlish et al.* discloses a video frame buffer memory 116 connected to digital video processor 114. In particular, a memory, such as the video frame buffer memory 116 of *Bindlish et al.*, requires a digital signal. Here, it is noted that the digital signals are being processed and eventually

provided to a DAC 126 as shown in FIG. 1B. In contrast, the signals being processed in the '843 patent are required to be analog signals. That is, in the '843 patent a variable amplitude adjustment is applied to the analog video signal. In addition, the Office admits that Applicant's Related Art does not disclose brightness processing of a video signal.

In view of the above, Applicant respectfully asserts that the digital videoframe buffer memory 116 cannot be implemented in the analog video signal adjustment of the '843 patent without changing the operational principles of the video signal amplitude adjustment. As such, Applicant respectfully notes that M.P.E.P. § 2143.01 instructs that "[i]f the proposed modification or combination of the prior art would change the principle operation of the prior art invention being modified, the teachings of the references are not sufficient to render the claims *prima facie* obvious."

Moreover, the video processor in claims 1 and 7 generates the processed data to implement a brightness level at a specific area of the liquid crystal display panel, and the position designator designates the specific area of the liquid crystal display panel. The '843 patent discloses only the video processor having the function adjusting the amplitude of a video signal. Because the video processor of the '843 patent is different from that of claims 1 and 7, the '843 patent and the Applicant's Related Art, whether taken alone or in combination, fails to teach or suggest the instantly claimed position designator. As pointed out in M.P.E.P. § 2131, a claim is anticipated by a prior art reference only if each and every element as set forth in the claim is found. Thus, a case of *prima facie* obviousness has not been established.

For at least the aforementioned reasons, Applicant respectfully asserts that the rejections of independent claims 1 and 7, as amended, are improper and should be withdrawn.

Independent Claim 9

As originally presented, claim 9 recites, in part, implementing a first picture for a first field and implementing a second picture for a second field. The Office admits that Applicant's Related Art and the '843 patent do not teach a first picture having a first field and a second picture having a second field. (Page 5, lines 15-16.) The Office attempts to cure this deficiency by stating that it would have been obvious to one of ordinary skill at the time the invention was made to recognize that the first and second image of Applicant's Related Art are driven by frames, each frame divided into fields. The Office then speculates that the first and second pictures correspond to different fields. (Page 5, lines 16-20.)

As pointed out in M.P.E.P. § 2143.03, all the claimed limitations must be taught or suggested by the prior art to establish *prima facie* obviousness of a claimed invention. Because the Office admits that Applicant's Related Art and the '843 patent fail to teach implementing a first picture for a first field and implementing a second picture for a second field, the rejection of claim 9 is improper as lacking "documentary evidence" to support its assertions. If the Office maintains the rejection and is relying on some "common knowledge" in the art, Applicant respectfully requests documentary evidence in accordance with M.P.E.P. § 2144.03.

Moreover, the driving method of a liquid crystal display according to claim 9 implements a first picture having a same brightness level irrelevant of the position of the liquid crystal panel for a first field, and implements a second picture having a different brightness level

corresponding to the position of the liquid crystal panel for a second field. That is, the Applicant's Related Art and the '843 patent, whether taken alone or in combination, fails to teach or suggest at least the above-mentioned features of claim 9. As pointed out in M.P.E.P. § 2131, a claim is anticipated by a prior art reference only if each and every element as set forth in the claim is found. Thus, a case of *prima facie* obviousness has not been established.

Dependent Claims

Claims 2-6, and 8 depend from one of independent claims 1 and 7. Because dependent claims incorporate the features of their respective base claims, claims 2-6, and 8 are also allowable because of the additional features they recite and the reasons stated above.

New Claims

Applicants have added new claims 10-17. Support for claims 10-17 is provided throughout Applicant's specification. Accordingly, no new matter has been introduced. Examination of new claims 10-17 is respectfully requested. Furthermore, claims 10-17 depend from one of independent claims 1 and 7. Therefore, claims 10-17 are also allowable over Applicant's Related Art, the '843 patent, and *Bindlish et al.*, whether taken alone or in combination, because of the additional features they recite and the reasons stated above.

CONCLUSION

In view of the foregoing, Applicant respectfully requests reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of the Amendment, the Examiner is invited to contact the Applicant's undersigned representative to expedite prosecution.

EXCEPT for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. §§ 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account No. 50-0310. This paragraph is intended to be a **CONSTRUCTIVE PETITION FOR EXTENSION OF TIME** in accordance with 37 C.F.R. § 1.136(a)(3).

Respectfully submitted,

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